



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



247885

923340

FEB 10 1998

REPLY TO THE ATTENTION OF:

HSE-5J

MEMORANDUM

DATE:

SUBJECT: ACTION MEMORANDUM - Request for an Emergency Removal Action at the Weltmeyer Auto site, Harvey, Cook County, Illinois

FROM: Fred Bartman, On Scene Coordinator
Emergency Response Section II *Fred Bartman*

THRU: Donald Bruce, Chief *Donald J. Bruce*
Emergency Response Section II

TO: Rick Karl, Chief
Emergency Response Branch

Site ID# : B531

I. PURPOSE

The purpose of this Action Memorandum is to request your approval of funds in the amount of \$81,500 for expenses incurred during an emergency removal action at the Weltmeyer Auto (WA) site in Cook County, Illinois. Verbal approval to undertake the emergency action under the Emergency Response Contract Services (ERCS) was obtained from the Acting Chief of the Emergency Response Branch on October 23, 1997. Emergency action was necessary to abate an immediate threat to public health and the environment caused by the spill of 1000 gallons of hydrochloric acid (HCL) and the presence of three unsecured tankers of HCL (estimated 12,000 gallons of liquid and 65 fifty-five gallon drums of solids) abandoned on site. There was also an estimated 30 abandoned containers of various sizes suspected to contain hazardous substances scattered throughout the property. The emergency action included securing the site and the removal of the HCL liquids and solids from the tankers, decontamination of the tankers, and removal of drums and other containers.

The proposed removal action abated the potential release of "hazardous substances," as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation and Liability

Act (CERCLA), 42 U.S.C. § 9601(14), by stabilizing, removing, and/or disposing of such substances pursuant to the authority set forth at Section 104(a) of CERCLA, 42 U.S.C. § 9604(a).

The site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# ILD0002093144

A. Removal Site Evaluation

The City of Harvey Hazardous Materials (HAZMAT) Team and the Illinois Environmental Protection Agency (IEPA) responded to a call from a Harvey citizen reporting a chemical spill at the site on October 22, 1997. The spill apparently was caused by individuals attempting to salvage for scrap metal one of the four tankers at the site. Witnesses said they heard and saw the chemical react upon release and called the City of Harvey and the IEPA. The City and the IEPA subsequently referred the matter to USEPA.

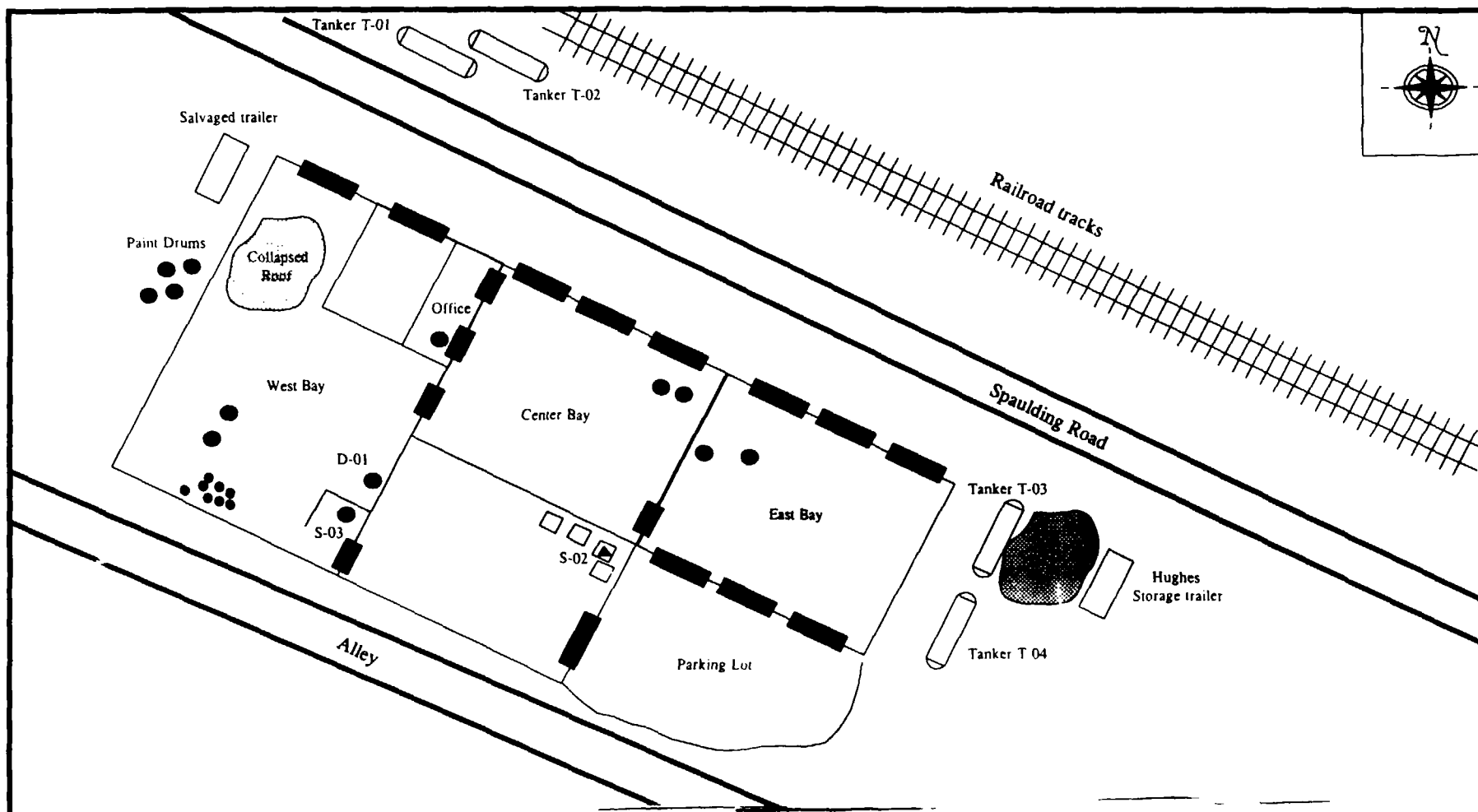
The site is located at 14752 Spaulding Avenue in Harvey, Cook County, Illinois (Figures 1 and 2). The latitude is 41.622' north and a longitude 87.66 west. A building that was formerly used to service semi-trucks is present on the western end of the site. The building, which is in disrepair and abandoned, was previously condemned by the City of Harvey. The area is primarily industrial and is located just south of Spaulding Avenue and a set of railroad tracks that run parallel to Spaulding Avenue. One residence is located adjacent to the west side of the site and is in close proximity to the abandoned condemned building. A residential area is located south, southwest, and southeast from the site.

An Environmental Justice analysis (Attachment I) was performed for the site. The Weltmeyer Auto site is considered a high minority low income area. There is 17,322 individuals within a one mile radius of which eighty six % are minorities with low income. The median income is \$ 24,000.







USEPA and START mobilized to the site on October 23, 1997. Four tankers were identified, inspected and sampled. Two of the tankers (T-03, T-04) were located on the eastern end of the site that is south of Spaulding Road; the other two (T-01, T-02) were located north of Spaulding Avenue. The acid spill occurred on the eastern end of the property south of Spaulding Road. See Figure 2.

The tanker closest to the spill (T-03) appeared to have been breached and was tipped to its side. That tanker contained

Map redacted due to geological
and geophysical information



Legend

-  Overhead door
-  Door
-  Drum
-  Small container
-  Bulklift bag w/ green solid
-  Acid spill area

EPA U.S. EPA Region 5 **EMERGENCY AND ENFORCEMENT RESPONSE BRANCH**

TITLE	Site Features Map	FIGURE	2
SITE	Weltmeyer Acid Spill	SCALE	Not to Scale
CITY	Harvey	STATE	Illinois
SOURCE	Ecology and Environment, Inc.	TDD	S05-9710-010
		DATE	11/12/97

approximately 100 gallons of liquid that had a pH less than two (extremely acidic). The soil where the spill occurred also had a pH less than two. The other nearby tanker (T-04) was completely full of liquid (5000 gallons) that also had a pH less than two. From these observations, USEPA concluded that the spilled acid emanated from the breached tanker (T-03).

One of the two tankers across the street was almost empty and may have contained asphalt, whereas the other tanker was completely full (6800 gallons) of liquid that had a pH less than two.

USEPA determined that the tankers contained HCL based upon (1) field tests that indicated a high chlorine content and a low pH; and (2) the placards on the tankers that identified the contents of the tankers as HCL.

The contents of two fifty five gallon drums inside the building were sampled. Field tests indicated that the drums may have contained a flammable material, which also had a pH of less than two. A one yard bag of solid material was also sampled. The building was easily accessible.

After obtaining verbal authorization to spend up to \$50,000, ERCS was fully mobilized on October 24, 1997. The HCL-contaminated soil was excavated and placed in a rolloff box. All drums and other containers (approximately thirty) were consolidated and placed in a secure area with warning signs posted. The tanker contents (12,000 gallons of acid) were off-loaded into another tanker and transported off-site for treatment.

ERCS remobilized on November 10, 1997. Work included the removal and disposal of acid solids (approximately 65 fifty-five gallon drums), decontamination of the tankers and the disposal of drums, other containers, and the HCL-contaminated soil.

Lab results verified that the tankers contained HCL. The drums contained elevated levels of lead and/or chromium and contained flammable liquids. HCL with a pH less than two is highly corrosive and, therefore, was identified as hazardous waste D002 under the Resource Conservation and Recovery Act (RCRA). See 40 C.F.R. § 261.22. Some of the drums contain ignitable material that is classified as hazardous waste D001 under RCRA. 40 C.F.R. § 261.21.

B. Other Actions to Date

Emergency action was initiated on October 24, 1997, and completed on November 15, 1997.

C. State and Local Authorities Role/Actions

On October 23, 1997, the City of Harvey and the State of Illinois verbally requested USEPA assistance. The City of Harvey provided backup, controlled traffic, and patrolled the area. The City of Harvey had previously condemned the building. It is unlikely that the State of Illinois or the City of Harvey will contribute funding towards the cost of the removal.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The National Contingency Plan (NCP), at 40 C.F.R. § 300.415(b)(2)(i) through (vii), provides specific criteria for evaluation of a threat and the appropriateness of a removal action.

The WA site met the NCP criteria for a time-critical removal action. Observations documented during the initial and follow-up visits to the site (as described above) establish the presence of the risk factors set forth at 40 C.F.R. § 300.415(b)(2)(i), (iii), (v) and (vi), each of which is discussed below:

- 1) **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

Hazardous wastes, by virtue of the characteristics of corrosivity and ignitability, were identified in tanks, drums and contaminated soils at the site. The tankers were abandoned and not in a secure area. The tanker manways could have been easily lifted by a child providing easy access and possible exposure to HCL acid. The tankers continued to have salvage value and, therefore, could have attracted scrappers who could have caused another spill. Such a spill may have potentially caused a reaction and exposed neighbors and/or trespassers to chlorine gas or HCL-contaminated liquid or soil. Contact with HCL is extremely hazardous and may cause extensive damage due to its acidic nature. In the event of a nearby fire such as the adjacent condemned building, a potentially explosive atmosphere could have developed, leading to release of a chlorine gas cloud in Harvey. Chlorine gas could have also been generated by the reaction of HCL with water.

Chlorine gas causes irritation of the upper respiratory tract; a concentration of less than 35 parts per million (ppm) causes irritation of the throat. More severe exposures may result in pulmonary edema. Concentrations of 1300-2000 ppm in air are lethal to humans over a brief exposure (up to a few minutes).

Moreover, the building was abandoned and in extremely poor

condition with several access points. The drums contained ignitable lead-based paint waste and were in poor condition (some were even leaking). Had they not been removed, trespassers may have been exposed to lead, a suspected carcinogen. Lead is also poisonous when ingested or inhaled and poses hazards affecting the nervous system, blood system, and kidneys.

2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

As stated above, the tanks with ignitable lead-based paint waste posed a fire hazard that could have led to further chemical reactions or dangerous explosions.

3) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The spilled HCL could have been transported off-site through groundwater due to percolation induced by precipitation. In addition, the building at the WA site is dilapidated and has even been condemned by the City of Harvey. The deteriorated condition of the building might have allowed rainwater and snow to enter the building during precipitation events. This water may have aided the movement of hazardous substances from containers and into the environment.

4) Threat of fire or explosion;

The flammable contents of the drums could have easily generated a fire which could have ignited the building and impacted the nearby tankers. A fire near the tankers could have resulted in the explosion and release of chlorine gas.

IV. ENDANGERMENT DETERMINATION

Actual or potential releases of hazardous substances from this site, as described in Sections II and III above, if not addressed by implementation of the response action described in this Action Memorandum, may have presented an imminent and substantial endangerment to public health or welfare or the environment.

V. EMERGENCY ACTION AND ESTIMATED COSTS

1. Project Ceiling Cost

The emergency removal action at the WA site consisted of securing the site, identifying and disposing of tanker, drum and other containers' contents, decontamination and disposal of the

tankers, and excavation and disposal of HCL-contaminated soil. The estimated cost and the removal project ceiling is as follows:

Emergency Response Contract Services:	\$ 60,000
START	\$ 7,500
<u>USEPA</u>	<u>\$ 14,000</u>
Removal Project Ceiling	\$ 81,500

The response actions described in this memorandum directly addressed actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which posed an imminent and substantial endangerment to public health and safety and the environment. These response actions did not pose a burden on affected property disproportionate to the extent to which that property contributed to the conditions being addressed.

2. Contribution to Remedial Performance

The proposed action should have removed all hazardous substances. This action eliminated threats posed by exposure to hazardous substances found on site and a fire and explosion hazard.

3. Description of Alternative Technologies

On-site treatment of hazardous substances found at the site was not cost effective or practical because of the relatively small quantity of waste. The additional start up and equipment costs associated with on-site treatment would not have been offset by savings in transportation and disposal costs.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

Federal ARARs determined to be applicable to the site were the RCRA requirements governing the handling, transportation and disposal of the hazardous waste. All ARARs of federal law were complied with to the extent practicable. State ARARs were complied with to the extent practicable. All off site disposal was done in accordance with the USEPA Off-Site Rule 40 CFR 300.440, 58 Federal Register 49215 (September 22, 1993), and with any state requirements.

5. Post Removal Site Control

Completion of removal activities will not require post removal site controls.

6. Estimated Cost

The total estimated cost associated with the above activity is \$81,500 of which up to \$60,000 was allotted to ERCS contractor costs. The final cost has not been determined at this date. The Removal Project Ceiling Cost Estimate is \$81,500 and is presented

in Section V.

VI. EXPECTED CHANGE IN SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Since the removal has been completed, this section is not applicable to this removal. The dangers that would have been posed by delaying the removal are summarized in Section III.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum (Attachment I).

X. RECOMMENDATION

This decision document represents the selected emergency action for the Weltmeyer Auto site in Harvey, Cook County, Illinois, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision was based upon the Administrative Record for the site (Attachment II). Conditions at the site met the criteria for a removal as set forth in the NCP at 40 C.F.R. § 300.415(b)(2)(I) through (vii) and, therefore, I recommend your approval of the completed removal action. The total project ceiling, if approved, will be \$81,500. Of this, an estimated \$60,000 can be used towards cleanup contractor costs. You may indicate your decision by signing below.

APPROVE:

Donald J. Bruce for Rick Karl
Chief, Emergency Response Branch

DATE: 2-10-88

DISAPPROVE:

Chief, Emergency Response Branch

DATE: _____

Attachments

- I.Environmental Justice
- II.Enforcement Confidential Addendum
- III.Administrative Record Index

cc: . K. Mould, EPA HQ, 5202G
Don Henne, Regional Environmental Officer
U.S. Department of Interior, Room 217
200 Chestnut Street, Philadelphia, PA 19106
E. Osowski, IEPA

ATTACHMENT I

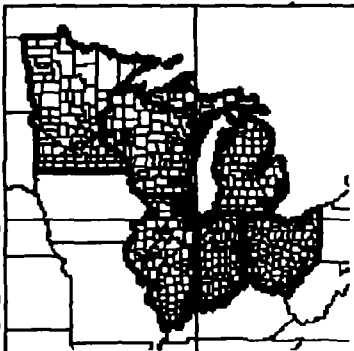
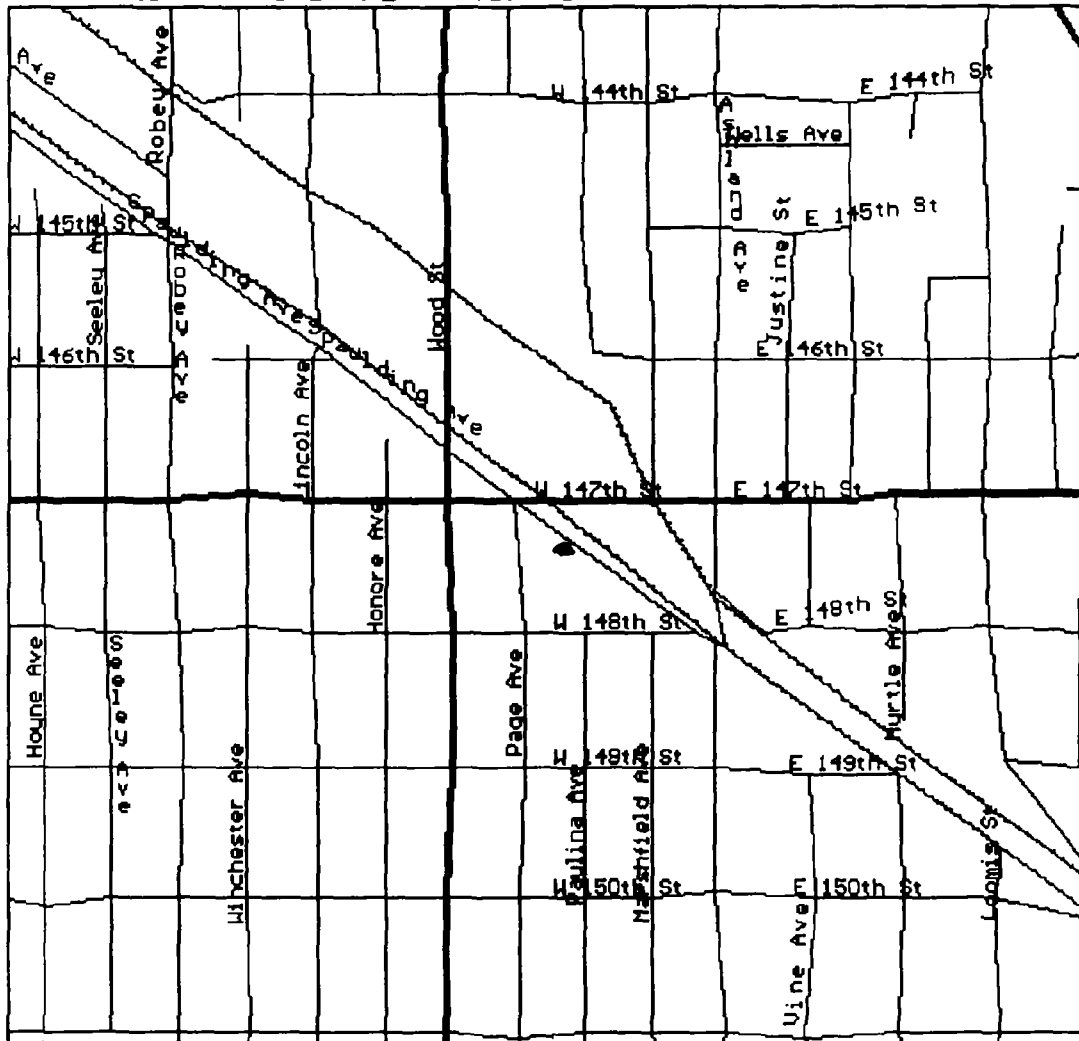
POPULATION SUMMARY

LOCATION	:	1.0 mi. radius at	41.622279, -87.659165
# BLOCK GROUPS INCLUDED	:	16	
NUMBER OF PERSONS	:	17322	
NUMBER OF FAMILIES	:	4010	
NUMBER OF HOUSEHOLDS	:	5351	
MEDIAN (EST.) HOUSEHOLD INCOME:		23940	
AGE 0 THRU 4	:	1534	
AGE 5 THRU 9	:	1525	
AGE 10 THRU 19	:	3227	
AGE 20 THRU 49	:	7342	
AGE 50 THRU 64	:	2153	
AGE 65 AND OVER	:	1541	
WHITE	:	2393	
BLACK	:	14518	
INDIAN	:	26	
ASIAN	:	17	
OTHER RACE	:	368	
HISPANIC	:	548	
OWNER OCCUPIED	:	3617	
RENTER OCCUPIED	:	1734	
PERCENT AGE 0 THRU 4	:	8.9	
PERCENT AGE 5 THRU 9	:	8.8	
PERCENT AGE 10 THRU 19	:	18.6	
PERCENT AGE 20 THRU 49	:	42.4	
PERCENT AGE 50 THRU 64	:	12.4	
PERCENT AGE 65 AND OVER	:	8.9	
PERCENT WHITE	:	13.8	
PERCENT BLACK	:	83.8	
PERCENT INDIAN	:	0.2	
PERCENT ASIAN	:	0.1	
PERCENT HISPANIC	:	3.2	
PERCENT OTHER RACE	:	2.1	
PERCENT OWNER OCCUPIED	:	67.6	
PERCENT RENTER OCCUPIED	:	32.4	

1"=0.2mi

1.00 by 0.97 miles

41.37.20/- 87.39.32



01: u.s. epa region 5

- ☐ U. S. MAP
- ☐ STATES
- ☐ COUNTIES
- ☒ MAJOR ROADS (from TIGER)
- ☒ RAILROADS (from TIGER)
- ☒ MINOR ROADS (from TIGER)

Tue Feb 03 14:18:17 1998

WELTMAYER AUTO SITE
ORIGINAL AR

DOCUMENT #2

"Action Memorandum: Request for an Emergency Removal
Action at the Weltmeyer Auto Site"

ATTACHMENT II
ENFORCEMENT ADDENDUM
2 PAGES

REDACTED

NOT RELEVANT TO THE SELECTION OF
THE REMOVAL ACTION

ATTACHMENT 3

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTIONADMINISTRATIVE RECORD
FOR
WELTMAYER AUTO SITE
HARVEY, COOK COUNTY, ILLINOISORIGINAL
FEBRUARY 9, 1998

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	02/04/98	Ecology and Environment, Inc.	U.S. EPA	Letter Report for the Acid Spill Site (a.k.a. 'Weltmeyer Acid Spill Site)	36
2	00/00/00	Bartman, F., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for an Emergency Removal Action at the Weltmeyer Auto Site (PENDING)	